

33. The network access device of claim 14 wherein the first private network subdevice and the second private network subdevice are cards in a rack having a common backplane.

## **REMARKS**

### **Objections to the Specification**

The Examiner has objected to the specification based on three informalities. First, the Examiner has requested that Applicants update the status of U.S. Patent Application Serial No. 09/035,600, now issued as U.S. Patent No. 6,353,614. Second, the Examiner has requested that the Applicants update the status of U.S. Patent Application Serial No. 09/270,967. Third, the Examiner has requested copies of the Srisureh and Cuervo references incorporated by reference in the specification.

Applicants have amended the specification with respect to U.S. Patent Application Serial No. 09/035,600, now issued as U.S. Patent No. 6,353,614. U.S. Patent Application Serial No. 09/270,967 is still pending, and therefore Applicants have not amended the specification with respect to this application. As requested by the Examiner, Applicants have submitted copies of the requested references. Applicants therefore respectfully request that the Examiner withdraw his objections to the specification.

### **Objections to the Claims**

The Examiner has noted a typographical error in Claim 14 and requested that Applicants replace the acronym MEGACO in Claims 30 and 32 with the complete name Media Gateway

Control. Applicants thank the Examiner for his identification of these issues and have amended the claims accordingly. Applicants therefore respectfully request that the Examiner withdraw his objections to the Claims 14, 30 and 32.

**Rejection of Claims 5 and 12 Under 35 U.S.C. § 112**

The Examiner has rejected Claims 5 and 12 as being duplicate claims. Applicants have amended Claim 12 to properly claim dependency from Claim 11, rather than Claim 1. Because Claims 5 and 12 are no longer duplicates, Applicants respectfully request that the Examiner withdraw his rejections of these claims under Section 112.

**Rejection of Claims 14, 16 and 25 for Obviousness-Type Double Patenting**

The Examiner has rejected Claims 14, 16 and 25 under the judicially-created doctrine of obviousness-type double patenting in view of Claims 4, 9 and 11 of U.S. Patent 6,353,614 (“the ‘614 patent”). Although Applicants disagree with the Examiner’s characterization of the ‘614 patent because the patent claims a method rather than the instant apparatus, in order to expedite prosecution, the Applicants file herewith a terminal disclaimer.

**Rejection of Claims 1-5, 9, 11-14, 16, 19, 23, 25 and 27 Under 35 U.S.C. § 102**

The Examiner has rejected Claims 1-5, 9, 11-14, 16, 19, 23, 25 and 27 under 35 U.S.C. § 102 as anticipated by U.S. Patent No. 5,835,723 (“Andrews”). Because Claims 1 and 14 are the sole independent claims of this group, and the remaining claims depend from either Claim 1 or Claim 14, Applicants contend that if Claims 1 and 14 are patentable over Andrews, the entire group is patentable over Andrews.

Applicants respectfully submit that rather than anticipating Claims 1 and 14, Andrews actually teaches away from Claims 1 and 14. In Andrews, there is a dedicated address that each of the nodes on the network monitors for address requests. *See* Fig. 1; col. 4, lines 42-46. Each node in the network also maintains a table of possible addresses it may request. *See* Col. 4, lines 30-32. When the first node requests a specific address based on its internal table, using the dedicated address request address, the other nodes monitoring the address request address transmit information regarding whether the specifically-requested address is already in use. *See*, In addition, Andrews is designed so that there is not a specific address server. *See* Col. 4, lines 11-18.

In contrast, the present invention provides for a specific RSIP server and RSIP gateway to the external network. The table of available addresses is maintained on the RSIP server. Remaining nodes on the network (the RSIP clients) request a non-specific address along with one or more ports from the RSIP server. The RSIP server then creates a combination address and transmits it back to the requesting node. Thus, the present invention is actually the opposite of Andrews.

Applicants therefore respectfully request that the Examiner withdraw his objections based on Andrews.

**Conditional Allowance of Claims 6-8, 10, 15, 17-18, 20-22, 24, 26 and 28-33**

The Applicants thank the Examiner for his recognition of the patentability of Claims 6-8, 10, 15, 17-18, 20-22, 24, 26 and 28-33, conditioned upon the correction of the informalities and Section 112 rejections noted above. Applicants have amended the claims as requested by the Examiner. However, each of these claims depends from a base rejected claim. Because the


Applicants believe they have appropriately overcome the Examiner's Section 102 of Claims 1 and 14, the underlying independent claims, Applicants contend that Claims 6-8, 10, 15, 17-18, 20-22, 24, 26 and 28-33 are patentable as written, and have not rewritten them in independent form. Applicants therefore respectfully request that the Examiner fully allow the claims.

Allowance of the claims and passage of the case to issue are respectfully solicited. Should the Examiner believe a discussion of this matter would be helpful, she is invited to telephone the undersigned at (312) 913-0001.

Respectfully submitted,

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